

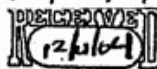


National Park Service
U.S. Department of the Interior

Channel Islands National Park

Source:
USCG Docket

Date: 12/20/04



2004/F004

Channel Islands Fax

To: Ken Kusano (G-MSO-5) 202/267-1184

Fax number: 202-267-4570

From: Superintendent, Channel Islands Nat'l Park

Phone: 805-658-5702

Date: 12-20-2004

Pages to follow: 4

Subject: Federal Docket No. USCG-2004-16877

Comments: Draft EIS/EIR for the Cabrillo Port LNG
Deepwater Port

Comments Attached.

EXPERIENCE YOUR AMERICA

The National Park Service cares for special places saved by the American people so that all may experience our heritage.



IN REPLY REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE
Channel Islands National Park
1901 Spinnaker Drive
Ventura, California 93001-4354

L7619-CHIS

December 15, 2004

Headquarters, U.S. Coast Guard
Mr. Mark Prescott
Chief, Office of Deepwater Ports Standards (G-MSO-5)
Room 1210
2100 Second Street, SW
Washington, D.C. 20593

Re: Federal Docket No. USCG-2004-16877 "Draft EIS/EIR for the Cabrillo Port LNG Deepwater Port"

Dear Mr. Prescott:

We are in receipt of Federal Docket No. USCG-2004-16877 "Draft EIS/EIR for the Cabrillo Port LNG Deepwater Port" and offer the following comments:

General Comment:

Overall, the Draft Environmental Impact Statement (DEIS) on the Cabrillo Port Liquefied Natural Gas (LNG) Deepwater Port provides an adequate description of the permitting, construction, and operational aspects of the proposal. Safety issues and procedures appear to be clearly addressed and the risk assessment seems to cover all possible scenarios. However, the document lacks a detailed analysis of environmental impacts resulting from an emergency situation, such as, an uncontrolled release of LNG or other fuels or substances used on site. The environmental document places a significant amount of faith in the use of permitting requirements, safety procedures, and best operating practices to alleviate the possibility of an emergency situation causing any undue environmental harm. Nonetheless, it should contain a detailed, quantified discussion of possible impacts on air, ocean, or shoreline resources in the event that the systems fail.

The boundaries of Channel Islands National Park should be clearly delineated on all maps and figures. The document identifies impacts to visitors to the park and to park resources, but the document fails to identify the park. If you do not have access to this information we will be glad to provide to you.

F004-1

F004-2

F004-1

The Final EIS/EIR has been updated throughout to address this comment. Sections 4.2.7.6 and 4.2.8.4 provide an analysis of the potential impacts on public safety. Sections 4.3.4, 4.5.4, 4.6.4, 4.7.4, and 4.19.4 present an analysis of the potential effects of an accident or release of LNG or natural gas on marine traffic, agriculture, air quality, marine biota, and environmental justice, respectively.

F004-2

The Channel Islands National Park boundary has been added to Figures ES-1, ES-3, 1.0-1, 3.3-1, 4.3-1, 4.7-1, and 4.16-1.

♻️ Printed on unbleached, 100% recycled paper with soy-based ink.

Specific Comments:

Volume I

Location/Page	Comment
p. ES-2	The "Need for the Project" identifies the need for increased natural gas supply for the United States and the State of California. However, there is no indication of a Purpose or Need that would limit the Alternatives for fulfilling this Need to serve southern California, as was done in the EIS.
p. ES-5	The plan states "A full range of reasonable alternatives was considered..." However, alternative locations outside of the Santa Barbara Channel were dropped because they are located "far from Southern California". The Purpose and Need for the project did not identify a requirement for the LNG facility to be located in Southern California. The Council of Environmental Quality guidelines require that the analysis of alternatives rigorously explore and objectively evaluate all reasonable alternatives, including the proposed action. There are reasonable alternatives outside of the Santa Barbara Channel.
Figure ES-3	The boundaries of Channel Islands National Park should be shown. The document identifies impacts to visitors to the park and to park resources. Therefore, the park should be identified on maps.
p. ES-28	The document correctly recognizes the use of the Project area for boating, sportfishing, sailing, whale-watching, and visiting the Channel Islands National Park. It would be more correct to say that the proposed action would "degrade" the experience of these users (rather than "alter" their experience).
p. ES-32	The Proposed Project is identified in the draft EIS/EIR as the "the environmentally preferred project". The responsibility of the Agencies preparing an EIS is to identify the "Environmentally Preferable Alternative" (bold added). It is not clear why the Proposed Project is considered Environmentally Preferable to the No Action Alternative. Additionally, the lack of consideration of reasonable alternatives outside of the Santa Barbara Channel undercuts the utility of the selection of an Environmentally Preferable alternative within such a limited number of reasonable options.
ES-48	It is not possible to determine if the impact of vessel lights during construction or operations will be "Less than significant" because the specifics for lighting control are not included in the EIS, but are left for a plan to be developed after approval of the EIS. Lights can be a significant attractant to seabirds. The specific limits on lighting are needed as part of the EIS.
ES-59	There is no indication of analysis of impacts of long-term noise generated during FSRU operations on marine mammals.
p. 1-7	Price comparisons between years should be adjusted with the Consumer Price Index to provide a comparison in terms of relative cost to consumers between years. As an example, the \$6.62 paid in 1999 is the equivalent of \$7.30 in 2003.

F004-3

F004-4

F004-5

F004-6

F004-7

F004-8

F004-9

F004-3

Section 1.2, Project Objectives, states in reference to the Project, "Cabrillo Port would provide a new facility for receiving LNG carriers from the Pacific Basin and transporting natural gas into Southern California markets via the existing SoCalGas natural gas transmission infrastructure." (Emphasis added) This requires that the facility be located in Southern California.

Sections 1.2, 3.1, 3.2, 3.3.1, 3.3.2, 3.3.3, 4.10, and 4.10.1.3 contain information on the range of alternatives evaluated. Under NEPA and the CEQA, a reasonable range of alternatives must be considered. NEPA requires consideration of a "reasonable" number of alternatives. In determining the scope of alternatives, the emphasis is on "reasonable." "Reasonable" alternatives include those that are practical and feasible from the technical and economic standpoint and using common sense (CEQ 40 Questions; #2a).

The information must be sufficient to enable reviewers and decision-makers to evaluate and compare alternatives. The State CEQA Guidelines section 15126.6(a) provides, in part, "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project."

The EIS/EIR initially evaluated 18 locations for the FSRU as potential locations for the deepwater port. It built on previous California Coastal Commission studies that evaluated nearly 100 locations. Sections 3.3.7 and 3.3.9 discuss alternate locations and technologies that were considered.

F004-4

See the response to Comment F004-2

F004-5

The presence of the FSRU may degrade the experience of some recreational users who perhaps expect or prefer an undeveloped environment, while other users could find that the presence of the FSRU does not impact their experience negatively. Section 4.4.4 contains information on impacts of the proposed Project on aesthetics.

F004-6

Under the Deepwater Port Act (DWPA), the Maritime Administrator

(the decision-making authority) issues a ROD to approve, approve with conditions, or deny a license application for a deepwater port. Because of MARAD's authority, the Final EIS/EIR does not identify an environmentally preferable alternative; to do so would be pre-decisional. Prior to issuing a license the Administrator will review and analyze all of the relevant information pertaining to the license application, as required under the DWPA. If the license is approved, or approved with conditions, the Administrator will indicate the agency's preferred alternative in the ROD.

F004-7

Section 2.2.2.2, Section 4.4.1.1, Impacts AES-2 and AES-5 in Section 4.4.4, and Impact BioMar-3 in Section 4.7.4 contain information on Project lighting, including regulatory requirements and design of lighting for construction and operation. Lighting would comply with regulatory requirements and would be designed to minimize nighttime impacts. The lighting would be used to ensure safety and security and when construction or operations require lighting. Section 4.7.4 contains information on impacts on marine biological resources from construction and operation lighting. AM BioMar-3a in Section 4.7.4 is a construction lighting/operation control plan that includes specific lighting restrictions.

F004-8

Impacts BioMar-3 and -5 in Section 4.7.4 discuss this topic.

F004-9

Section 1.2.3, "Natural Gas Need in California," contains updated information in this regard.

Sholly, Brian

From: Flynn, Louise [LFlynn@comdt.uscg.mil]
Sent: Tuesday, December 21, 2004 7:47 AM
To: Sholly, Brian
Subject: FW: Comments RE: BHP DWP Draft EIS/EIR

Source:
 USCG Docket

Date: 12/20/04

From: Kusano, Ken LT
Sent: Monday, December 20, 2004 4:13 PM
To: 'Cy Oggins'; Prescott, Mark; Flynn, Louise; Cheryl Karpowicz (ckarpowicz@ene.com); 'dwp@comdt.uscg.mil'; Michael Ferris; 'Mardula, Francis'; 'bsholly@ene.com'; Lang, Joan
Subject: FW: Comments RE: BHP DWP Draft EIS/EIR

V/r, KK
 LT Ken Kusano
 U.S. Coast Guard Headquarters
 Deepwater Port Standards Division (G-MSO-5)
 202-267-1184

From: Tim Riley [mailto:Tim.Riley@gte.net]
Sent: Monday, December 20, 2004 4:05 PM
To: Kusano, Ken LT
Subject: Comments RE: BHP DWP Draft EIS/EIR

Comments Regarding the Draft EIS/EIR for the Cabrillo Port LNG Deepwater Port Application

Docket #: USCG 2004-16877
 State Clearing House #: 2004021107

Submitted By:
 Tim Riley and Hayden Riley
 Co-Hosts of <http://TimRileyLaw.com>
 Co-Hosts of <http://LNGDanger.com>
 Co-Producers of the LNG Documentary film: *The Risks and Danger of LNG*
 Phone: 805-984-2350

The Draft EIS/EIR fails to adequately investigate, analyze and determine that the construction and operation of the subject Deepwater Port is in the national interest and consistent with national security and other national policy goals and objectives including energy sufficiency and environmental quality.

We respectfully direct the readers' attention more specifically as follows:

1. The Draft EIS/EIR has merely accepted the Department of Energy (DOE) projections for supply and demand of natural gas in the United States without performing its own independent

12/29/2004

2004/F004

F004-9.1

See the response to Comment F004-3.

F004-9.2

Figure 1.0-1 has been updated to include the boundaries of the Channel Islands National Park.

F004-9.3

See the response to Comment F004-3. Sections 3.1 and 3.2 discuss the process used to identify select reasonable alternatives. Sections 3.3.5, 3.3.6, and 3.3.7 discuss the other locations that were considered.

F004-10

Section 3.3.8.1 contains additional information on this topic to clarify the analysis and rationale used to eliminate this alternative.

F004-11

Section 4.3.4 contains information on potential impacts associated with the increased vessel traffic due to the proposed Project and mitigation measures to address impacts. The safety zone would extend in a circle a maximum of 500 meters from the stern of the FSRU. The area to be avoided (ATBA) would surround the safety zone, but would not extend as far as the coastwise traffic lanes (see Figure 4.3-4 and Sections 2.2.4 and 4.3.1.4).

Section 4.3.1.4 states, "The ATBA is considered by the USCG to be a recommendatory routing measure. Mariners could choose whether to avoid this area. Mariners would not be penalized for entering this area, nor would any action be taken to require them to leave the area. A vessel transiting the ATBA would be requested to restrict its speed to no more than 10 knots (19 km/hour) and to check in and out with the Cabrillo Port vessel operations manager. Both the speed limit restriction and contact with the Cabrillo Port vessel operations manager would be voluntary actions by mariners in vessels transiting the ATBA." Therefore, vessel traffic in the traffic lanes would not be affected by the safety zone or the ATBA (see Section 4.3.4). The safety zone could not be made any larger because its size is governed by international law. Impact MT-3 in Section 4.3.4 contains information on potential increased safety hazards for recreational and other boaters due to the presence of the FSRU and LNG carriers.

F004-12

Section 4.4.1.1 has been updated. Impact AES-2 in Section 4.4.4 and Impact BioMar-3 in Section 4.7.4 discuss lighting impacts.

G470-1

G470-2

F004-13

Ships are a normal part of the viewshed, and the FSRU would resemble a ship on the horizon. To the extent that it would be visible at all, it is considered to be a minor adverse, long-term impact under NEPA. Appendix F describes how visibility from various distances was evaluated and provides additional simulations prepared for viewpoints at elevated sites along the Malibu coastline and inland areas.

F004-13.1

See the response to Comment F004-7.

	provided in the EIS/EIR is sufficient to determine the level of impact of lights to seabirds.
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F004-13.1
cont.

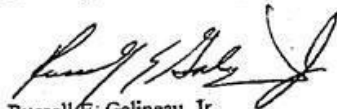
Volume II

Appendix B, p. 4	The report indicates that "The LNG Terminal Act requires the Coastal Commission to include this site, selected by Western LNG Associates, in its ranking." Is the Coastal Commission doing a similar ranking to compare the selected site of BHP Billiton against other reasonable alternatives? Such a process would be a rational approach to ensuring that the environmentally preferable site location is chosen to supply LNG to California.
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F004-14

Thank you for providing us an opportunity to comment on the project. Please refer all questions to me at the above address or by calling 805/658-5702.

Sincerely,



Russell E. Galipeau, Jr.
Superintendent

F004-14

The LNG Terminal Siting Act was repealed in 1987 by the California Legislature. California Senate Bill 426 (Simitian), which would have created a ranking process for different LNG projects, was re-referred to the California Assembly Committee on Utilities and Commerce on August 24, 2006. As of November 30, 2006, the Legislature's Current Bill Status shows it as "From Assembly without further action," which ended the consideration of the bill during the 2005-06 Legislative Session.

Kusano, Ken LT

From: Liana_Reilly@nps.gov
Sent: Tuesday, December 21, 2004 7:46 PM
To: Kusano, Ken LT
Subject: Cabrillo-NPS comments to addend
Attachments: Cabrillocomments.doc



Cabrillocomments.doc (29 KB)

Dear Ken,

As mentioned in my phone message, attached are the additional comments that the National Park Service would like added to the original letter and previously submitted comments. I apologize for any confusion it may have caused to not have them arrive in conjunction with our previous comments.

Please let me know if you have any questions or comments regarding the Air Resource Division's addition or if you would prefer to have them faxed to you. Thank you for your understanding and for taking our comments and concerns into account.

Best regards,
Liana

Liana Reilly
Environmental Protection Specialist

liana_reilly@nps.gov
303 987 6895 (phone)
303 969 2822 (fax)

Mailing Address:
National Park Service
Air Resources Division
12795 W. Alameda Parkway
Lakewood CO 80228

(See attached file: Cabrillocomments.doc)

National Park Service
Air Resources Division
Comments on Cabrillo Port Liquefied Natural Gas Deepwater Port License Application
December 20, 2004

Thank you for the opportunity to submit comments on the Cabrillo Port Liquefied Natural Gas Deepwater Port License Application. As the project is less than 40 kilometers from Channel Islands National Park and is less than 300 kilometers from Joshua Tree National Park and Death Valley National Park, NPS is interested in this application. The Air Resources Division (ARD) of the National Park Service (NPS) thus submits the following comments:

ARD would like to see tight controls placed on all equipment used for the project, especially considering that Ventura County exceeds the federal standard for ozone and the state's PM 10 air quality standard. The fact that Los Angeles County is designated as nonattainment for three criteria pollutants furthers ARD's suggestion that the best available control technology (BACT) be used to ensure that the air quality in the area is protected.

NPS notes that the emissions from the barges coming to the FSRU need to be taken into account.

ARD commends the applicant for realizing the need to undergo the conformity process and suggests that the applicant follows through with the analysis.

NPS is concerned with the decrease in night visibility as dark night skies are one of the features that the public seeks in its national parks and is a resource that the NPS protects. Natural darkness is an important component of Wilderness and is also an Air Quality Related Value akin to daytime visibility. Outdoor lights change the nighttime scene for many miles surrounding these facilities, and are suspected of having detrimental impact to nocturnal wildlife. The negative effects of artificial lighting can be greatly reduced while still meeting the safety and illumination needs of the proposed facilities.

- 1) Lights should be switchable or on motion sensors so that lights are only activated when necessary.
- 2) All lights should be shielded so that no light escapes above the horizontal plane. In lighting terminology, all luminaires should be "full cut-off."
- 3) For lighting that is within or can impact environmentally sensitive zones, illumination levels should use be at the minimum brightness for the application as defined by the Illuminating Engineers Society of North America.
- 4) Consider dual lighting circuits if there are differing lighting needs. For example a lower intensity security light that may need to be on at all times and a higher intensity work light that is occasionally needed.

ARD recommends that the applicant follow through with the ideas to utilize BACT and low-emission fuels. ARD recommends that the applicant further investigate using after-treatment devices, including diesel oxidation catalysts and diesel particulate filters to keep air emissions to a minimum.

F010-1

The Project has been modified since issuance of the October 2004 Draft EIS/EIR. Section 4.6.1.3 contains an updated analysis of the air pollution control technologies to be incorporated into the Project. The Applicant prepared an emission control technology analysis for FSRU emission sources as part of the air permit application to the USEPA.

F010-2

Barges would be used only during the construction phase of the Project. Section 4.6.1.3 includes a discussion of emissions associated with barge operations (e.g., tug emissions).

F010-3

The Draft General Conformity Determination was issued in March 2006 with a 30-day public comment period. However, based on equipment changes proposed by the Applicant, MARAD, and the USCG has determined that the General Conformity Rule does not apply. Appendix G4 contains additional information on this topic.

F010-4

Section 2.2.2.2, Section 4.4.1.1, Impact AES-2 in Section 4.4.4, and Impact BioMar-3 in Section 4.7.4 contain information on Project lighting, including regulatory requirements and design of lighting for construction and operation. Lighting would comply with regulatory requirements and would be designed to minimize nighttime impacts. The lighting would be used to ensure safety and security and when construction or operations require lighting. Section 4.4.4 contains information on aesthetic impacts and Section 4.7.4 contains information on impacts on marine biological resources from construction and operation lighting. Section 4.4.1.1 contains information on the employment of movement sensors and shielding for lighting. AM BioMar-3a in Section 4.7.4 is a construction lighting/operation control plan that includes specific lighting restrictions.

F010-5

The Project has been modified since issuance of the March 2006 Revised Draft EIR. See Section 1.4.2 for a summary of Project changes. The following Project changes would reduce emissions of nitrogen oxide and other air pollutants:

- Reduction in the number of LNG carriers and change in crew vessel trips;
- Use of natural gas to power LNG carriers in California Coastal Waters;
- Diesel-fueled support vessels with emission controls; and
- Use of specific engine standards for onshore construction

F010-1

F010-2

F010-3

F010-4

F010-5

equipment.

The Applicant has committed to implement the following additional measure to reduce air emissions:

- Repowering of existing non-Project vessels with cleaner-burning engines.

These changes required revisions to air pollutant emission estimates and related air quality analyses.

National Park Service
Air Resources Division
Comments on Cabrillo Port Liquefied Natural Gas Deepwater Port License Application
December 20, 2004

NPS would like to see more information on how air quality will be protected in case of emergency actions and releases.

F010-6

NPS would like to see any cumulative impacts addressed in the final EIS.

F010-7

NPS recommends the preferred alternative as the other alternatives bring the project even closer to National Park Service lands.

F010-8

Thank you for the opportunity to comment and for taking the Air Resource Division's comments into account.

F010-6

Impact AIR-3 in Section 4.6.4 contains revised information on impacts from an LNG spill or pipeline rupture.

F010-7

Section 4.20.3.6 contains air quality impacts cumulative analysis.

F010-8

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

312170



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240



2005 JAN 21 A 11:05

E-MAIL INFORMATION
DOCKETS

In Reply Refer To:
ER 04/827

JAN 12 2005

Docket Management Facility
U.S. Department of Transportation
Room PL-401
400 Seventh Street, SW.
Washington, DC 20590-0001

Re: USCG-2004-16877 - 925

Dear Sir/Madam:

The Department of the Interior has reviewed the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Cabrillo Port Liquefied Natural Gas (LNG) Deepwater Port. Overall the draft document is thorough and well written with descriptive information and analyses generally well done. The Risk Assessment was comprehensively done and used effectively in the analyses. We reviewed sections of the document according to our areas of expertise and performed a general review as well. We have outlined a few of our concerns below and have also included detailed specific comments. The remarks that follow identify specific areas that we think could be corrected, clarified, or where supplementary detail is needed.

We have identified the following primary deficiencies:

1. With regard to Chapter 2 and Section 4.18 *Water Quality and Sediments*, there is no discussion of the potential impact to offshore salinity/water quality from the operational discharge of nearly 200,000 gallons of distilled freshwater per day. Please consider some discussion of this potential impact and perhaps relate it to freshwater outflows in the vicinity. Even if you should decide there is no impact, it is a major discharge that could occur every day for 40 years.
2. The Construction and Installation Section should provide a description of anchoring and mooring operations that would be conducted by the support vessels, material barges and tugs during installation of the Floating Storage and Regasification Unit (FSRU). Anchoring and mooring operations conducted during pipeline installation should also be discussed. It is questionable whether the dynamically positioned vessel (DP) will eliminate the need for all anchoring particularly in the nearshore area where pipeline tie-in work will be conducted.

F006-1

F006-2

2004/F006

F006-1

The Project has been modified since issuance of the October 2004 Draft EIS/EIR. See Section 1.4.2 for a summary of Project changes. The previously proposed FSRU generator engine cooling system used seawater as the source of cooling water for the four generator engines. The Applicant now proposes using a closed tempered loop cooling system that circulates water from two of the eight submerged combustion vaporizers (SCVs) through the engine room and back to the SCVs, which reduces the seawater intake volume by about 60 percent. The seawater cooling system would remain in place to serve as a backup system during maintenance of the SCVs or when the inert gas generator is operating. The submerged combustion vaporizer (SCV) process generates excess water. These units would generate approximately 200,000 gallons (757 m³) per day of clean, slightly acidic, distilled water. Of this total, approximately 10,000 gallons (37.9 m³) per day would be treated for use onboard to supplement the potable water supply and for wash down water, estimated at 63,400 gallons (240 m³) per week based on one 8-hour deck wash down event per week. The remaining 190,000 gallons (719.1 m³) per day would be used for ballasting operations. Therefore, none of this water would be directly discharged to the ocean.

Section 2.2.2.4 contains a description of the proposed uptakes and water uses for the FSRU. Section 4.18.4 contains revised information on this topic. Section 4.18.2 contains information on the regulations with which the Applicant would comply to treat, discharge, and/or dispose of wastes and wastewaters.

F006-2

Sections 2.5 and 2.6, which describe the installation of the FSRU, the offshore pipelines, and the shore crossing, have been updated with additional information. Please note that HDB is now the proposed method for the shore crossing. Appendix D2 provides an anchor mitigation plan for the HDB nearshore pipeline and Appendix D3 contains plans for HDB nearshore operations.

3. Since the Department's Minerals Management Service (MMS) will be issuing a right-of-way (ROW) permit under 30 CFR 250.1009 for the LNG pipelines associated with Cabrillo Port, MMS requirements for geohazards, biological and cultural surveys must be met and the results analyzed in the Final EIS. It does not appear from the information provided in the Draft EIS/EIR that this has occurred. For the appropriate Notice to Lessees (NTLs) regarding requirements on these surveys, please consult the MMS website.

F006-3

F006-3

As discussed in Section 2.3.1, if a license were issued, it would be conditioned to require that construction and installation of pipelines meet the MMS standards per existing or developed agreements between the MMS and the USDOT PHMSA prior to commencement of construction activities. This includes any additional environmental analysis that may be deemed necessary.

Thank you the opportunity to review this important Draft EIS/EIR and to provide these comments. See also the enclosed specific page comments. If you have specific technical questions regarding these comments, please contact Dirk Herkhof at the Minerals Management Service at (703) 787-1735; for all other questions you may contact Ken Havran in the Office of Environmental Policy and Compliance at (202) 208-7116.

Sincerely,



Willie R. Taylor
Director
Office of Environmental Policy
and Compliance

Enclosure

Comment/Resolution Matrix
Cabrillo Port DWP EIS/EIR –Draft January, 2005

Enclosure

#	Chapter	Page	Line	Agency/ Reviewer	Comment and Recommended Resolution	
1	ES	22	10-11	MMS/DH	In the second paragraph, the Draft EIS states that offsets for operational emissions would be negotiated with EPA Region IX, while on pages 4.6.11 and 4.6.14 of the main Draft EIS document, it says that offset requirements would be negotiated with the Ventura County APCD. Please clarify the discrepancy.	F006-4
2	2.0	2-33	1	MMS/JBS	The Construction and Installation Section should provide a description of anchoring and mooring operations that would be conducted by the support vessels, material barges and tugs during installation of the FSRU. Anchoring and mooring operations conducted during pipeline installation should also be discussed. It is questionable whether the dynamically positioned vessel (DP) will eliminate the need for all anchoring particularly in the nearshore area where pipeline tie-in work will be conducted.	F006-4.1
3	2.0	2-37	14	MMS/JBS	This section and/or the commercial fishing section should describe design features and other measures that would be taken to ensure that the anode rings, Buckle arrestors, other pipeline appurtenances, pipeline crossings, and pipeline support structures do not constitute a potential obstruction to commercial fishing operations.	F006-5
4	2.0	2-38	1	MMS/JBS	The text states that the pipes would be loaded at a nearby port (e.g. Port Hueneme) on four cargo barges for transport to the pipe-laying vessel. This statement is inconsistent with later text on Page 4.3-10 (line 1) which states that fuel and construction materials would likely be mobilized from the Ports of Los Angeles and Long Beach.	F006-5
5	2.0	2-38	10	MMS/JBS	The text seems to indicate the pipelines would be installed by both lay-barges and a DP vessel. The text should clarify whether both lay-barges and a DP vessel will be used and provide a more detailed description of where each of these vessels would lay pipelines and how they would work in tandem.	F006-6
6	2.0	2-38	10	MMS/JBS	If pipelines are going to be transported by cargo barges to the construction site and offloaded onto the DP vessel, the text should describe how offloading operations would be conducted.	F006-7

F006-4

The USEPA has made a preliminary determination, on which the lead agencies must rely, that the FSRU should be permitted in the same manner as sources on the Channel Islands that are part of Ventura County. Section 4.6.2 contains an updated discussion of relevant regulatory requirements.

F006-4.1

See the response to Comment F006-2.

F006-5

Impacts SOCIO-1 and -2 in Section 4.16.4 discuss this topic.

F006-6

Sections 2.5, 2.6, and 4.3.1.2 have been revised to clarify the logistics of materials handling for the proposed Project.

F006-7

Sections 2.6.1 and 2.6.2 describe the vessels needed for pipeline installation and construction.

F006-8

Section 2.6.2 contains additional information on pipeline installation. Section 2.6.2.2 contains information on unloading of pipes from cargo barges.

#	Chapter	Page	Line	Agency/ Reviewer	Comment and Recommended Resolution	
7	2.0	2-38	12	MMS/JBS	The information presented in Table 2.4-1 is not consistent with the information presented in Table 4.3-2 (pg 4.3-10). The information should be corrected and the descriptive information in the text of the document revised accordingly.	F006-9
8	2.0	2-38	15	MMS/JBS	Large DP vessels may have the capacity to carry all of the pipeline to be installed during this project. If so, this would eliminate the need to transport pipelines by barge to the construction site. It may also eliminate the need for lay-barges.	F006-10
9	4.6	14	1-5	MMS/DH	The conformity analysis would address the impacts from construction emissions in state waters. However, emissions in federal waters are not subject to conformity requirements as they are outside the nonattainment area. In conformity determinations that have been performed for offshore activities elsewhere, only emissions in state waters were included since federal waters are not classified with respect to the National Ambient Air Quality Standards (NAAQS). Please explain how you would mitigate the potential effects from offshore construction activities in federal waters.	F006-11
10	4.6	15	3-8	MMS/ME MMS/DH	Please summarize in the Final EIS the results of the air quality modeling analysis required under the Prevention of Significant Deterioration (PSD) regulations. Provide air quality modeling highest estimated concentrations, peak hour modeling scenarios, meteorological data sources, etc. to support the conclusions stated in the text.	F006-12
11	4.9	19	13-14	MMS/MJS	Paleontological resources and geologic features should not be included in the "Cultural Resources" section unless they are part of an archaeological site, have been modified by humans, or have been identified as a sacred site by a Native American group.	F006-13
12	4.9	20	24	MMS/MJS	It is suggested that the term "Maritime" be changed to "Marine". The term "Maritime" generally refers to cultural resources associated with navigation and shipping. A broader term that would also include submerged prehistoric resources would be "Marine".	F006-14

F006-9

Sections 2.5 and 4.3.1.2 have been revised in response to the comment.

F006-10

Sections 2.6.1 and 2.6.2 contain additional information on the vessels required for the shore crossing and pipeline installation, respectively.

F006-11

The Applicant has made commitments to use engines in onshore construction equipment that would comply with USEPA's more stringent Tier 2, 3 or 4 emission standards. This would result in *de minimis* emissions levels; therefore, MARAD and the USCG have determined that the General Conformity Rule no longer applies, and a General Conformity Determination is not required.

Section 4.6.1.3 and Section 4.6.2 contain revised Project emission estimates and a revised discussion of the applicability of the General Conformity Rule to the Project, respectively. Appendix G4 contains a copy of the revised General Conformity analysis.

The potential air quality impacts from offshore construction in Federal waters were determined to be less than significant. No additional mitigation measures were identified for offshore vessels. Section 4.6.4 contains information on air quality impacts and emission reduction measures associated with offshore construction equipment and vessels.

F006-12

The Project has been modified since issuance of the October 2004 Draft EIS/EIR. See Section 1.4.2 for a summary of Project changes. Impact AIR-8 in Section 4.6.4 contains an updated analysis of impacts on air quality from the FSRU and Project vessels.

F006-13

Section 4.9.3 has been updated in response to the comment.

F006-14

Section 4.9 has been revised in response to the comment.

F006-15

#	Chapter	Page	Line	Agency/ Reviewer	Comment and Recommended Resolution
13	4.20	4	7	MMS/MH	Please revise "six" Consistency Determinations to "ten". This should additionally be corrected throughout the document wherever the number of Consistency Determinations is documented.
MH – Maurice Hill, Environmental Scientist, MMS, 805-389-7815, Maurice.Hill@mms.gov DH – Dirk Herkhof, Meteorologist, MMS, 703-787-1735, Dirk.Herkhof@mms.gov MJS – Melanie J. Stright, Archaeologist, MMS, 703-787-1736, Melanie.Stright@mms.gov JBS – John Smith, Physical Scientist, MMS, 805-389-7833, John.Smith@mms.gov ME – Mark Eckenrode, Physical Scientist, MMS, 805-389-7827, Mark.Eckenrode@mms.gov DP – Dave Panzer, Oceanographer, MMS, 805-389-7823, Dave.Panzer@mms.gov					

F006-15

The text in Section 4.20.1.6 has been revised in response to the comment.